



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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MAY 31 2012

Ms. Kathleen C. Antoine
Environmental Director
HOVENSA L.L.C.
1 Estate Hope
Christiansted, VI 00820-5652

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Dear Ms. Antoine:

This is in response to your April 26, 2012 letter to Steven Riva, Chief of our Permitting Section, regarding the cessation of HOVENSA's ambient air SO₂ monitoring stations.

We have considered the information contained in your letter and we understand your reasons for idling the five SO₂ monitoring stations since HOVENSA has also stopped operating all refinery process units. You also indicate that while HOVENSA has no plans to restart the process units at the facility, you would resume operation of the monitors if the process units were restarted.

While HOVENSA has stopped refinery operations, HOVENSA's future operations are not entirely clear to EPA since all existing permits remain active. Given this uncertainty, I request HOVENSA to continue to operate all five monitors for the remainder of 2012. I also request that HOVENSA continue to operate at least one monitor until such time that the HOVENSA refinery operations are permanently shut down and the respective permits are surrendered, or until HOVENSA decides to restart the process units, at which time you would resume monitoring operations as required by the permit.

While HOVENSA's FCC PSD permit was issued to require the operation of the five air monitoring stations, there had been previous SO₂ monitoring requirements prior to the FCC PSD permit which also required SO₂ sampling to ensure compliance with the SO₂ national ambient air quality standards. At this time, EPA remains concerned about the ability to obtain SO₂ air quality data for St. Croix since the agency is currently in the process of issuing SO₂ designations for the entire country. The ability to continue to show a trend of the area meeting the SO₂ standards is especially important since there was violation of the SO₂ design value over the 2008-2010 time period. While the design value data from the more recent 2009-2011 time period shows the area meeting the SO₂ standard, there were exceedances continuing into 2011. There currently is no other way to obtain this data for St. Croix in such a short time.

As for your offer to turn over the monitoring sites to EPA or the Virgin Islands and to possibly train technicians to operate the sites, we appreciate the offer and continue to consider this option as another way to sample for SO₂ on St. Croix.

I would like to discuss this matter with you in more detail and I will be contacting you directly within the next week. Please contact me at 212-637-3706 with any questions. I appreciate the continuing assistance you have provided to my office on this and other matters.

Sincerely

Richard K. Werner
Raymond Werner, Chief
Air Programs Branch

cc: Commissioner Alicia Barnes, VIDPNR
Director David Alvaro Simon, VIDPNR